

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SATNAM DISTRIBUTORS LLC, D/B/A  
LION & BEAR DISTRIBUTORS,

Plaintiff

v.

COMMONWEALTH-ALTADIS, INC.,  
COMMONWEALTH BRANDS, INC.,  
ALTADIS U.S.A. INC., AND HAROLD  
LEVINSON ASSOCIATES, INC.,

Defendants.

Civil Action No. 2:14-cv-06660-JCJ

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT AS TO  
DEFENDANT HAROLD LEVINSON ASSOCIATES, INC.’S  
VIOLATION OF THE ROBINSON-PATMAN ACT**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Satnam Distributors LLC respectfully moves for summary judgment against Defendant Harold Levinson Associates, Inc. (“HLA”) as to HLA’s violation of the Robinson-Patman Act, 15 U.S.C. § 13. As set forth in the accompanying memorandum, there are no genuine issues of material fact and Satnam is entitled to judgment as a matter of law. If the Court grants this motion, the only issue for trial will be the extent of damages caused to Satnam by the unlawful price discrimination.

Dated: September 20, 2017

Respectfully submitted,

/s/ Brent W. Landau

Brent W. Landau  
HAUSFELD LLP  
325 Chestnut St., Suite 900  
Philadelphia, PA 19106  
(215) 985-3270  
(215) 985-3271 (fax)  
blandau@hausfeld.com

Irving Scher  
HAUSFELD LLP  
33 Whitehall Street  
14th Floor  
New York, NY 10004  
(646) 357-1196  
(212) 202-4322 (fax)  
ischer@hausfeld.com

*Attorneys for Plaintiff*